

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

FILED

2023 SEP 29 AM 11:00

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

<i>In re.</i>		Chapter 11
Lordstown Motors Corp., et al.,		Case No. 23-10831 (MFW)
Debtors.		Jointly Administered

MOTION OF RAHUL SINGH FOR RELIEF TO DEFRAUDED SHAREHOLDERS

1. I plead with the court to not allow Foxconn and Lordstown Motors Corp. (LMC) to use bankruptcy court to defraud United States citizens of their savings.
2. My family put \$1,090,406.56 from our retirement accounts into LMC stock only to be defrauded by Foxconn and LMC as follows:
 - a) Foxconn's fraud *after* getting a talented workforce and generously equipped auto plant (one of the biggest) for a mere 230 million dollars,
 - b) LMC not telling shareholders about Foxconn's fraud in a timely manner.
3. Excluding one claim (#30) from a person that seeks 200 million dollars on basis of 219 shares, the remaining 677 claims (including ours) as of 9/26/2023 seek less than 11 million dollars in total. (source: kccllc.net/lordstown/register)

RELIEF REQUESTED

4. After being defrauded, it is reasonable for wanting our claims to be processed immediately. The claims listed below seek no interest or punitive damages, but only what we paid for the shares. I plead with the court to order LMC to pay claims 8-11 listed below from LMC's current cash balance immediately, prior to holding Foxconn accountable.

\$81,442.72 Claim #8 at kccllc.net/lordstown/register. Date filed 8/3/2023
\$152,118.81 Claim #9 at kccllc.net/lordstown/register. Date filed:8/3/2023
\$492,105.43 Claim #10 at kccllc.net/lordstown/register. Date filed: 8/3/2023
\$364,739.60 Claim #11 at kccllc.net/lordstown/register. Date filed:8/3/2023.

I respectfully request this Court enter an order, substantially in the form attached hereto as Exhibit A, granting the relief by ordering payback to defrauded shareholders.

Dated: September 27, 2023

Respectfully submitted by:

/s/ Rahul Singh

Rahul Singh

2061 Argentum Ave., Indian Land SC 29707.

PH: 224-706-0017. E-mail: sonuram@aol.com

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re.		Chapter 11
Lordstown Motors Corp., et al,		Case No. 23-10831 (MFW)
Debtors.		(Jointly Administered)

ORDER GRANTING RELIEF TO DEFRAUDED SHAREHOLDERS

Upon consideration of the Motion of Rahul Singh for Relief to Defrauded Shareholders; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Lordstown Motors Corp. will immediately pay the amounts specified below from their current cash balance:

\$81,442.72 Claim #8 at kccllc.net/lordstown/register. Date filed 8/3/2023

\$152,118.81 Claim #9 at kccllc.net/lordstown/register. Date filed 8/3/2023

\$492,105.43 Claim #10 at kccllc.net/lordstown/register. Date filed 8/3/2023

\$364,739.60 Claim #11 at kccllc.net/lordstown/register. Dated filed 8/3/2023

FILED

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

2023 SEP 29 AM 11:01

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

<i>In re.</i>		Chapter 11
Lordstown Motors Corp., et al.,		Case No. 23-10831 (MFW)
Debtors.		Jointly Administered

NOTICE OF MOTION OF RAHUL SINGH FOR RELIEF TO DEFRAUDED SHAREHOLDERS

PLEASE TAKE NOTICE that, on September 28, 2023, Rahul Singh filed a *Motion of Rahul Singh for Relief to Defrauded Shareholders* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy court**”).

PLEASE TAKE FURTHER NOTICE THAT responses or objections, if any, to the Motion must be filed on or before **October 11, 2023 by 4:00 p.m. ET** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, Clerk’s Office, 824 North Market Street, Third Floor, Wilmington, Delaware, 19801 and served upon, so as to actually be received by Rahul Singh at sonuram@aol.com on or before the Objection deadline.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion, if required, will be held on **October 18, 2023 at 10:30 a.m. ET** (the “**Hearing Date**”) before the Honorable Mary F. Walrath, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware, 19801. Only responses and objections in writing and timely filed, served and received in accordance with this Notice will be considered by the Bankruptcy Court at this hearing.

PLEASE TAKE FURTHER NOTICE THAT, IF NO RESPONSES OR OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated September 28, 2023.

Respectfully submitted by

/s/ Rahul Singh

Rahul Singh

2061 Argentum Ave., Indian Land, SC 29707.

PH: 224-706-0017. E-mail: Sonuram@aol.com

CERTIFICATE OF SERVICE

I, Rahul Singh, hereby certify that, on September 28, 2023, I served a true and correct copy of

1. Motion of Rahul Singh for Relief to Defrauded Shareholders, and
2. Notice of Motion of Rahul Singh for Relief to Defrauded Shareholders,

by email to the counsel for Debtors listed below:

Thomas E. Laria (tlauria@whitecase.com)

Matthew C. Brown (mbrown@whitecase.com)

Fan B. He (fhe@whitecase.com)

David M. Turetsky (david.turetsky@whitecase.com)

and by email to counsel for Foxconn listed below:

Matthew M. Murphy (mattmurphy@paulhastings.com)

Matthew Micheli (mattmicheli@paulhastings.com)

Michael C. Whalen (michaelcwhalen@paulhastings.com)

Mike Huang (mikehuang@paulhastings.com)

Kevin P. Broughel (kevinbroughel@paulhastings.com).

Dated September 28, 2023.

Respectfully submitted by

/s/ Rahul Singh

Rahul Singh

2061 Argentum Ave., Indian Land, SC 29707

PH: 224-706-0017. E-mail: Sonuram@aol.com

US BANKRUPTCY COURT
CLERK'S OFFICE
DISTRICT OF SOUTH CAROLINA

2023 SEP 29 AM 11:01

FILED